

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

HOLOPHANE EUROPE LIMITED, ACUITY
BRANDS LIGHTING DE MEXICO S DE RL
DE CV, HOLOPHANE S.A. DE C.V., and
ARIZONA (TIANJIN) ELECTRONICS
PRODUCTS TRADE COMPANY, LTD.,

Defendant.

Case No 2:19-cv-00291-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

YAHAM OPTOELECTRONICS CO., LTD.,

Defendant.

Case No. 2:19-cv-00398-JRG-RSP
(Consolidated Case)

JURY TRIAL DEMANDED

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG DISPLAY CO., LTD.,

Defendants.

Case No. 2:19-cv-00252-JRG-RSP

JURY TRIAL DEMANDED

JOINT P.R. 4-3 CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Patent Rule 4-3, plaintiff Ultravision Technologies, LLC (“Ultravision”) and
defendants Holophane Europe Limited, Acuity Brands Lighting De Mexico S DE RL DE CV,

Holophane S.A. De C.V., and Arizona (Tianjin) Electronics Products Trade Company, LTD. (collectively, “Holophane”), Yaham Optoelectronics Co., Ltd (“Yaham”), and Samsung Electronics Co., Ltd. (“Samsung”) (collectively, “Defendants”) provide this Joint Claim Construction and Prehearing Statement regarding the asserted claims of U.S. Patent Nos. 8,870,410; 8,870,413; 9,734,738; 9,947,248; and 10,223,946. In accordance with Patent Rule 4-2(c), the parties met and conferred for the purposes of narrowing the issues and finalizing preparation of this Joint Claim Construction Chart.

I. P.R. 4-3(a)(1) Agreed Constructions

The parties have met and conferred in an attempt to narrow the issues before the Court and have identified certain terms for which they agree. They are attached as Exhibit A.

II. P.R. 4-3(a)(2) Disputed Terms

Ultravision’s proposed constructions and identification of intrinsic and extrinsic evidence is attached hereto as Exhibit B. Defendants’ proposed constructions and identification of intrinsic and extrinsic evidence is attached hereto as Exhibit C. Each party also reserves the right to cite to intrinsic and/or extrinsic evidence cited by the other party.

III. P.R. 4-3(a)(3) Anticipated Length of Time for the Claim Construction Hearing

The parties expect that three hours will provide sufficient time to conduct the claim construction hearing.

IV. P.R. 4-3(a)(4) Anticipated Witnesses at the Claim Construction Hearing

At the present time, no party proposes to call witnesses for live testimony at the claim construction hearing.

V. P.R. 4-3(a)(5) Other Issues to be Addressed at the Claim Construction Hearing

The parties are not presently aware of any issues which might be taken up at a prehearing conference prior to the Claim Construction Hearing.

VI. P.R. 4-3(b) Service of Expert Testimony

In accordance with Patent Rule 4-3(b), the parties will each serve a disclosure of expert testimony simultaneous with this filing consistent with Fed. R. Civ. P. 26(a)(2)(B)(i)–(ii) or 26(a)(2)(C) for any expert on which it intends to rely to support its proposed claim construction or indefiniteness position or to oppose any other party’s proposed claim construction or indefiniteness position.

Dated: June 9, 2020

Respectfully submitted,

/s/ Alfred R. Fabricant

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2020, a true and correct copy of the above and foregoing document has been served by email on all counsel of record.

/s/ Alfred R. Fabricant

Alfred R. Fabricant